



Association of College & University Telecommunications Administrators

January 12, 1994

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street Northwest
Room 222
Washington, D.C. 20554

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FCC MAIL ROOM

RE: In the Matter of Policies and Rules Concerning Toll Fraud,
CC Docket No. 93-292; Notice of Proposed Rulemaking

Dear Mr. Caton:

Enclosed for filing are the comments of the Association of College and University Telecommunications Administrators, Inc. (ACUTA) in CC Docket 93-292, Notice of Proposed Rulemaking.

We have taken the liberty to enclose an original and ten copies. This should enable each commissioner to receive a personal copy of our comments. Please file mark a copy and return it to me in the enclosed envelope.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Collett', is written over a horizontal line.

Randal R. Collett
Executive Vice President
ACUTA

Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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IN THE MATTER OF

Policies and Rules Concerning
Toll Fraud

CC Docket 93-292

Notice of Proposed
Rulemaking

COMMENTS OF
THE ASSOCIATION OF COLLEGE AND UNIVERSITY
TELECOMMUNICATIONS ADMINISTRATORS, INC. (ACUTA)

I. INTRODUCTION

1. ACUTA is a non-profit organization with over 700 public and private college and university members, including most of the nation's large public universities. ACUTA's membership is divided roughly equally between institutions with enrollments of less than 2,000; 2,001 to 5,000; 5,001 to 10,000; 10,001 to 20,000; and over 20,000. In all, ACUTA represents over one-third of the non-profit institutions of higher learning in this country.

II. TELEPHONE FRAUD IS ALREADY A SUBSTANTIAL PROBLEM ON COLLEGE AND UNIVERSITY CAMPUSES.

2. According to an ACUTA membership survey, 60% of our members have experienced toll fraud on their campuses, primarily by residence hall residents, within the past four years. The types of fraud most commonly reported include: unauthorized use of calling cards; improper use of 10XXX+0 dialing to intentionally bypass in-place credit limitations and other calling restrictions; International calls; and collect/third party calls that bypass blocking and screening codes.

3. Because college students are long term users of campus telephone systems, they have ample time and opportunity to determine how to place fraudulent calls. Without reliable methods of blocking and screening, colleges and universities are unduly exposed to a budding society of fraud perpetrators, particularly in the area of 10XXX+0 calls which they are no longer at liberty to block.

III. REGULATIONS CONCERNING TOLL FRAUD SHOULD ALSO INCLUDE CENTREX OFFERINGS FROM THE LOCAL TELEPHONE COMPANIES.

4. While ACUTA applauds the Commission's approach to the fraud issues covered under this NPRM, we strongly suggest that the range of the NPRM be expanded to also include fraud in the CENTREX environment. Many of our member institutions utilize these central office based offerings by the Local Exchange Carriers (LECs) in lieu of on-site PBXs. Software enhancements and the capabilities of partitioning have allowed the CENTREX products to closely emulate a PBX environment. (NOTE: For obvious reasons, the proposed changes to Part 68 concerning "Warning Labels" would not be applicable to CENTREX)

5. In many respects, however, CENTREX users are at a disadvantage when compared to their PBX cousins. In most cases they have no direct control over the operation of the switching system and its line and trunk attributes, and are at the mercy of the LEC, who can be slow to respond to cases of fraud with effective control measures. The LECs have not been as vigorous in the development and deployment of fraud countermeasures.

IV. BLOCKING AND SCREENING CODES ARE NOT 100% EFFECTIVE IN PREVENTING TOLL FRAUD.

6. The wide range of technical capabilities of phone systems deployed around the nation, coupled with numerous Line Identification Data Bases (LIDB) have resulted in blocking and screening codes not being 100% effective. Further, no blocking and screening codes are delivered with International calls. Our members experience indicates that it is simply unrealistic to depend on blocking and screening codes, as currently implemented, as an effective means of preventing toll fraud.

7. Our members have indicated that their LEC account representatives are generally unfamiliar with what screening and blocking services are available. Further, the LECs have demonstrated little or no flexibility in how quickly blocking and screening can be implemented once a case of fraud is uncovered.

8. There have also been occasions where the blocking and screening codes have been inadvertently removed by the LECs. In these situations, the end users discover the problem only after bills are issued. While resolution of the bill has generally been in the users favor, closer administration of blocking and screening codes would increase their effectiveness.

9. ACUTA contends that where blocking and screening codes are a tariffed item, customers are paying for services that cannot be

ACUTA Comments
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delivered. Without a requirement for delivery of blocking and screening codes with each call coupled with a requirement for the IXC or OSP to check the blocking and screening codes on each call, there simply is no reason to expect blocking and screening codes to prevent toll fraud.

V. ACUTA's RECOMMENDATIONS

10. The development of a standardized LIDB which would be utilized by all LECs, IXCs, and OSPs. This would enable the end user to be assured that blocking and screening codes would be available to all LECs, IXCs, or OSPs on all calls.

11. Require that blocking and screening attributes be passed to all LECs/IXCs/OSP's along with the other caller details whenever a call is handed off for completion.

12. Require customers to specify blocking and screening attributes when ordering telephone services from the LECs. The initial service order process, where users specify custom calling features, directory listings and the like, lends itself well to this function.

13. Publicize this information so that users, LECs, IXCs, and OSPs all have approximately the same level of understanding about blocking and screening. It is ACUTA's position that full cooperation will occur only with this education process.

VI. CONCLUSION

14. ACUTA supports the FCC's efforts in achieving closer coordination between the industry, consumers, and government in detecting and preventing toll fraud. We applaud any effort to inform consumers and to establish reasonable policies of assigning liability for toll fraud. We believe that our recommendations can be translated into statutory requirements that will address the goals and objectives of the FCC in this matter.

ACUTA Comments
CC Docket 93-292, NPRM

Respectfully submitted,

ASSOCIATION OF COLLEGE AND
UNIVERSITY TELECOMMUNICATIONS
ADMINISTRATORS, INC. (ACUTA)

By: _____

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